

REMARKS

I. Formalities

Applicant thanks the Examiner for indicating that prosecution has been reopened in view of the Appeal Brief filed on October 27, 2006.

II. Status of the Application

Claims 1-16 are all the claims pending in the Application. Claims 1-16 have been rejected.

The present Response addresses each point of rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

III. Claims Rejections - 35 U.S.C. § 103

The Examiner has rejected claims 1-2, 9 and 12-16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,035,193 to Buhrmann et al. (hereinafter "Buhrmann") in view of U.S. Patent No. 6,029,065 to Shah (hereinafter "Shah"). The Examiner has also rejected claim 3 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Buhrmann, in view of Shah, and further in view of European Patent Application No. EP 0 748 136 to Sipilä (hereinafter "Sipilä"). Finally, the Examiner has rejected claims 4 and 6-7 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Buhrmann, in view of Shah and Sipilä as applied to claim 3 above, and further in view of U.S. Patent No. 6,434,399 to Kasmperschroer (hereinafter "Kasmperschroer"). Applicant respectfully traverses all of these rejections for *at least* the independent reasons stated below.

A. Independent Claim 1

The grounds of rejection acknowledge that Buhrmann fails to teach or suggest the feature of a correspondence memory establishing a correspondence between service codes of a first network and service codes of a second network, as recited in claim 1. Nevertheless, the grounds of rejection apply Shah, alleging that Shah discloses a memory establishing correspondence. Further, the grounds of rejection allege that it would have been obvious to one of ordinary skill in the art to modify the teachings of Buhrmann with the teachings of Shah, so as to arrive at the claimed invention, for the simple purpose of compatibility between networks, as allegedly taught by Shah.

Applicant respectfully disagrees with the grounds of rejection for *at least three* fundamental reasons, which are explained in detail below.

By way of overview, the claimed invention is directed to, among other things, a method for enabling a user who subscribes to a mobile telephone service, and who also subscribes to a landline telephone service, to access the services associated with both the mobile telephone service and the landline telephone service (e.g., call forwarding, voicemail, etc.) in a totally transparent manner.

Accordingly, the claimed invention, among other things, allows the user to access the landline telephone network or the mobile network from the same handset, in exactly the same way. As a result, the user does not have to memorize and use multiple different sets of service codes for specific use with the mobile telephone service and the landline telephone service, respectively. In order to achieve this object, and others, the claimed invention comprises a

correspondence memory establishing a correspondence between service codes of a first network of a communication terminal, and service codes of a second network, which is connected to a private base.

First, Applicant submits that the grounds of rejection have failed to establish even a *prima facie* case of obviousness because the grounds of rejection have failed to demonstrate that either Buhrmann, Shah, or any combination thereof, teaches or suggests this feature of a correspondence memory.

In sharp contrast to the recitations of claim 1, Buhrmann teaches nothing more than a wireless radio telephone that is operative with a landline supported private base station. Column 1, lines 6-9. Buhrmann provides no teaching or suggestion regarding a correspondence memory establishing a correspondence between service codes of a first network of Buhrmann's wireless radio telephone, and service codes of a second network, which is connected to Buhrmann's private base (i.e., the landline network). In fact, Buhrmann teaches quite the opposite of establishing a correspondence between service codes of two networks, in that Buhrmann expressly teaches that the mobile operator must memorize and use the service codes that are specific to Buhrmann's private base station. See column 7, line 57 – column 8, line 10.

Similarly, Shah fails to remedy the deficient teachings of Buhrmann. To the contrary, Shah teaches that a local base station of a public mobile telephone network determines what features a visiting mobile station of a public user supports, and then provides the feature codes to the visiting mobile telephone that are required to access the network features. See e.g., Abstract. That is, Shah teaches a method for remote feature code programming and conversion for a

visiting mobile station of a public user (i.e., a mobile station of a user from the public at large), which is accessing a public base station, rather than accessing the mobile station's home network. Column 3, lines 25-53.

Hence, at the very most, Shah teaches conversion between feature codes of two public base stations. Notably, Shah does not provide any teaching or suggestion whatsoever regarding a correspondence memory establishing a correspondence between service codes of a first network of a communication terminal, and service codes of a second network, which is connected to a private base, as suggested by the grounds of rejection.¹ Indeed, the public base stations of a mobile telephone network taught in Shah are fundamentally different than the private base recited in claim 1. For example, public base stations are configured to provide an extremely wide coverage area so as to facilitate access to the general public in a cell, which may extend over several miles. In contrast, a private base is restricted to a comparatively tiny coverage area of just a few hundred meters, and is configured for private use by an individual. See e.g., page 5, lines 1-3 of the present specification. As such, Shah also fails to teach or suggest all the recitations of claim 1 for *at least* these reasons.

Secondly, even if one were to combine the teachings of Buhrmann with those of Shah, as proposed by the grounds of rejection, one still would not arrive at the invention recited in claim 1. Quite to the contrary, if one were to modify Buhrmann's wireless radio telephone, which is

¹ The grounds of rejection allege that Buhrmann's wireless radio telephone's network correspond to the claimed "first network," and that the landline network of Buhrmann's private base station corresponds to the claimed "second network."

operative with a landline supported private base station, with Shah's teaching of conversion between feature codes of two public base stations, the result would be completely different from claim 1. In fact, such a proposed combination would simply yield a wireless radio telephone, which is operative with a landline supported private base station (as taught in Buhrmann), wherein, if the wireless radio telephone visits a public base station of a public mobile telephone network (that is other than its home public base station), then the visited public base station determines what features the visiting wireless radio telephone supports and provides the feature codes that are required to access the visited network features.

There is no teaching or suggestion whatsoever in either Buhrmann or Shah that would lead one of ordinary skill in the art to fundamentally modify the combined teachings of Buhrmann and Shah so as to develop a correspondence memory that establishes a correspondence between service codes of Buhrmann's wireless radio telephone's network (i.e., the alleged first network) and service codes of the landline network of Buhrmann's private base station (i.e. the alleged second network).

Shah teaches conversion between feature codes of two public base stations for mobile stations, but provides no indication whatsoever that such teachings could be successfully applied to the fundamentally different configuration of private bases, much less that such teachings could be implemented between the network of a wireless radio telephone and the landline network of a private base. Indeed, Shah's teachings are limited only to mobile stations and have nothing at all to do with landline networks.

Third, the grounds of rejection fail because one of ordinary skill in the art would not have been motivated to combine the teachings of Buhrmann and Shah in the manner proposed. The grounds of rejection allege that it would have been obvious for a skilled artisan to combine the teachings of Buhrmann and Shah to arrive at the claimed invention and allege that the motivation for doing so would have been for the simple purpose of compatibility between networks, as allegedly taught by column 1, lines 5-10 of Shah.

Applicant respectfully disagrees. Shah does not support the alleged motivation for which it is cited. Shah teaches that it is desirable to provide a user-transparent conversion of network feature codes in a mobile station to facilitate the mobile station's access to a visited public mobile telephone network. Therefore, if anything, a skilled artisan might look to Shah for teachings regarding how to convert feature codes in a mobile station as the mobile station switches to a visited public mobile telephone network. However, Shah does not provide any motivation for a skilled artisan to establish a correspondence between service codes of Buhrmann's public wireless radio telephone's network and service codes of the landline network of Buhrmann's private base station, as suggested by the grounds of rejection.

In view of the above, Applicant respectfully submits that claim 1 is patentable over Buhrmann, Shah, and any combination thereof, for *at least* these reasons. Additionally, Applicant submits that claims 2-14 are patentable over the cited references *at least* by virtue of their dependency on claim 1. Thus, Applicant respectfully requests that the Examiner withdraw these rejections.

B. Independent Claim 15

In view of the similarity between the recitations of claim 15 and the recitations discussed above with respect to independent claim 1, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claim 1 apply *at least* by analogy to claim 15. As such, it is respectfully submitted that claim 15 is patentably distinguishable over the cited references *at least* for reasons analogous to those presented above. Therefore, Applicant respectfully requests that the Examiner withdraw this rejection.

C. Independent Claim 16

In view of the similarity between the recitations of claim 16 and the recitations discussed above with respect to independent claim 1, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claim 1 apply *at least* by analogy to claim 16. As such, it is respectfully submitted that claim 16 is patentably distinguishable over the cited references *at least* for reasons analogous to those presented above. Therefore, Applicant respectfully requests that the Examiner withdraw this rejection.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.111
U.S. Appln. No. 09/918,501

Attorney Docket No.: Q65593

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Respectfully submitted,

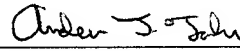
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